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Hearing Date and Time: October 15, 2009
Objection Deadline: October 9, 2009

Attorneys for Evergreen Solar, Inc.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	Chapter 11
	:	
LEHMAN BROTHERS HOLDINGS, INC., <u>et al.</u>,	:	Case No. 08-13555 (JMP)
	:	
Debtors.	:	Jointly Administered
	:	
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	:	
In re:	:	SIPA Proceeding
	:	
LEHMAN BROTHERS, INC.	:	Case No. 08-01420 (JMP)
	:	
Debtor.	:	
	:	
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**JOINDER OF EVERGREEN SOLAR, INC. TO MOTION OF OFFICIAL COMMITTEE
OF UNSECURED CREDITORS OF LEHMAN BROTHERS HOLDINGS INC., ET AL.,
PURSUANT TO 11 U.S.C. §§ 105(a) AND 107(a), TO UNSEAL MOTIONS FOR RELIEF
FROM SEPTEMBER 20, 2008 SALE ORDER (AND RELATED SIPA SALE ORDER)**

TO THE HONORABLE JAMES M. PECK
UNITED STATES BANKRUPTCY JUDGE:

Evergreen Solar, Inc. ("Evergreen"), by its undersigned attorneys Goodwin Procter LLP,
hereby files this joinder (the "Joinder") to the Motion (the "Motion to Unseal") of the Official
Committee of Unsecured Creditors of Lehman Brothers Holdings Inc., et al. (the "Committee"),

pursuant to sections 105(a) and 107(a) of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (as amended, the “Bankruptcy Code”), for the entry of an order unsealing (with limited exceptions relating to compensation information) the filed—yet redacted—versions of:

(i) Motion of Official Committee of Unsecured Creditors of Lehman Brothers Holdings Inc., et al., Pursuant to 11 U.S.C. § 105(a), Fed. R. Civ. P. 60(b), and Fed. R. Bankr. P. 9024, for Relief From Order Under 11 U.S.C. §§ 105(a), 363, and 365 and Federal Rules Of Bankruptcy Procedure 2002, 6004 and 6006 Authorizing and Approving (A) Sale of Purchased Assets Free and Clear of Liens and other Interests and (B) Assumption and Assignment of Executory Contracts and Unexpired Leases, dated September 20, 2008 (and Related SIPA Sale Order) and Joinder in Debtors’ and SIPA Trustee’s Motions for an Order Under Rule 60(b) to Modify Sale Order (the “Committee Motion”),

(ii) Debtors’ Motion for an Order, Pursuant to Fed. R. Civ. P. 60 and Fed. R. Bankr. P. 9024, Modifying September 20, 2008 Sale Order and Granting Other Relief, dated September 15, 2009 (the “LBHI Motion”), and

(iii) Trustee’s Motion for Relief Pursuant to the Sale Orders or, Alternatively, for Certain Limited Relief Under Rule 60(b), dated September 15, 2009 (the “Trustee’s Motion”) and the accompanying Declarations of William R. Maguire and James B. Kobak, Jr. in Support of the Trustee’s Motion.

Simultaneously herewith, Evergreen has filed joinder to the Committee Motion to protect its interest with respect to the matters set forth in the adversary proceeding captioned Evergreen Solar, Inc. v. Barclays Capital, Inc., Lehman Brothers Holdings, Inc., and Lehman Brothers, Inc., Adv. Pro. No. 08-01633 (JMP). Because much of the information contained in the Committee Motion is currently redacted, and as “[t]here is a strong presumption and public policy in favor of public access to Court Records,” In re Food Mgmt. Group, LLC, 35 B.R. 543,553 (Bankr. S.D.N.Y. 2007), Evergreen similarly supports the relief requested in the Motion to Unseal and, for the reasons set forth therein, respectfully requests that the Court enter an order (substantially in the form set forth in the proposed order attached to the Motion) authorizing (i) the Committee to file a substantially unredacted form of the Committee Motion, (ii) authorizing LBHI to file a substantially unredacted form of the LBHI Motion, (iii) authorizing the Trustee to file a

substantially unredacted form of the Trustee's Motion and the declarations in support thereto,
and (iv) and providing Evergreen such other and further relief as the may be deemed just and
proper.

Dated: New York, New York
October 9, 2009

GOODWIN PROCTER LLP

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